

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-01570 (GBD)(FM) ECF Case
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*This document relates to:*

*Estate of John Patrick O'Neill, Sr., et al. v. The Republic of Iraq, et al., 04-CV-1076 (GBD) (SN)*

*Estate of John P. O'Neill, Sr. et al. v. Al Baraka Investment and Development Corporation, et al., 04-CV-01923 (GBD) (SN)*

*C. I. O'Neill et al. v. Republic of the Sudan, et al., 18-CV-12114*

*Estate of John P. O'Neill, Sr. et al. v. Kingdom of Saudi Arabia, et al., 04-CV-01922 (GBD) (SN)*

*Aamoth et al. v. Islamic Republic of Iran, 18-CV-12276 (GBD) (SN)*

*Aamoth et al. v. Kingdom of Saudi Arabia, 18-CV-12270 (GBD) (SN)*

*Abel et al. v. Islamic Republic of Iran, 18-CV-11837 (GBD) (SN)*

*Abel et al. v. Kingdom of Saudi Arabia, 18-CV-11880 (GBD) (SN)*

*Ades et al. v. Islamic Republic of Iran, 18-CV-07306 (GBD) (SN)*

*Agyeman et al. v. Islamic Republic of Iran, 18-CV-05320 (GBD) (SN)*

*Aron et al. v. Islamic Republic of Iran, 20-CV-09376 (GBD) (SN)*

*Asaro et al. v. Islamic Republic of Iran, 20-CV-10460 (GBD) (SN)*

*Bernaerts et al. v. Islamic Republic of Iran, 19-CV-11865 (GBD) (SN)*

*Bianco et al. v. Islamic Republic of Iran, 20-CV-10902 (GBD) (SN)*

*Bodner et al. v. Islamic Republic of Iran, 19-CV-11776 (GBD) (SN)*

*Bonomo et al. v. Kingdom of Saudi Arabia, 18-CV-11885 (GBD) (SN)*

*BNY Mellon et al. v. Islamic Republic of Iran, 19-CV-11767 (GBD) (SN)*

*Bush et al. v. Kingdom of Saudi Arabia, 18-CV-11964 (GBD) (SN)*

*Cintron-Lugos et al. v. Kingdom of Saudi Arabia, 18-CV-11888 (GBD) (SN)*

*DeConto et al. v. Kingdom of Saudi Arabia, 18-CV-11904 (GBD) (SN)*

*DeRubbio et al. v. Islamic Republic of Iran, 18-CV-05306 (GBD) (SN)*

*Deuel et al. v. Kingdom of Saudi Arabia, 18-CV-12272 (GBD) (SN)*

*Garger et al. v. Kingdom of Saudi Arabia, 18-CV-11950 (GBD) (SN)*

*Gordenstein et al. v. Kingdom of Saudi Arabia, 18-CV-11941 (GBD) (SN)*

*Hargrave et al. v. Islamic Republic of Iran, 20-CV-09387 (GBD) (SN)*

*Harris et al. v. Kingdom of Saudi Arabia, 18-CV-11946 (GBD) (SN)*

*Hemenway et al. v. Islamic Republic of Iran, 18-CV-12277 (GBD) (SN)*

*Jimenez et al. v. Islamic Republic of Iran, 18-CV-11875 (GBD) (SN)*

*Kamardinova et al. v. Islamic Republic of Iran, 18-CV-05339 (GBD) (SN)*

*Kim et al. v. Islamic Republic of Iran, 18-CV-11870 (GBD) (SN)*

*Kincaid et al. v. Kingdom of Saudi Arabia, 18-CV-12273 (GBD) (SN)*

*Lang et al. v. Kingdom of Saudi Arabia*, 18-CV-11926 (GBD) (SN)  
*Mercer et al. v. Kingdom of Saudi Arabia*, 18-CV-11965 (GBD) (SN)  
*Moody-Theinert et al. v. Islamic Republic of Iran*, 18-CV-11876 (GBD) (SN)  
*Morris et al. v. Islamic Republic of Iran*, 18-CV-05321 (GBD) (SN)  
*Murray et al. v. Kingdom of Saudi Arabia*, 18-CV-11966 (GBD) (SN)  
*Ortiz et al. v. Kingdom of Saudi Arabia*, 18-CV-12274 (GBD) (SN)  
*Perez et al. v. Kingdom of Saudi Arabia*, 18-CV-11967 (GBD) (SN)  
*Richards et al. v. Kingdom of Saudi Arabia*, 18-CV-11969 (GBD) (SN)  
*Rivelli et al. v. Islamic Republic of Iran*, 18-CV-11878 (GBD) (SN)  
*Rooney et al. v. Kingdom of Saudi Arabia*, 18-CV-11970 (GBD) (SN)  
*Rowenhorst et al. v. Islamic Republic of Iran*, 18-CV-12387 (GBD) (SN)  
*Schlissel et al. v. Islamic Republic of Iran*, 18-CV-05331 (GBD) (SN)  
*Spence et al. v. Kingdom of Saudi Arabia*, 18-CV-11971 (GBD) (SN)  
*Stackpole et al. v. Kingdom of Saudi Arabia*, 18-CV-12275 (GBD) (SN)  
*Zelmanowitz et al. v. Kingdom of Saudi Arabia*, 18-CV-12381 (GBD) (SN)

**DECLARATION OF JERRY S. GOLDMAN  
IN SUPPORT OF MOTION TO WITHDRAW  
ALEXANDRA PLUSCARR AS ATTORNEY OF RECORD**

1. I am a member of the law firm of Anderson Kill P.C. (“AK”), attorneys for the Plaintiffs in the above referenced actions (collectively, “*O’Neill Plaintiffs*”), and serve on the Plaintiffs’ Executive Committee for Personal Injury and Death Claims in all of the actions consolidated in the captioned proceedings.

2. I am familiar with the proceedings in this case. I have been lead counsel for the *O’Neill Plaintiffs* since the inception of this action in the Southern District of New York. I make this statement in support of the law firm of AK’s motion to withdraw Alexandra Pluscarr as attorney of record for the *O’Neill Plaintiffs* in the above captioned matter.

3. Alexandra Pluscarr is no longer affiliated with the law firm of AK.

4. For the foregoing reason, the undersigned respectfully requests that this Court grant the law firm of AK leave to withdraw Alexandra Pluscarr as attorney of record in the above captioned matter. A proposed Order is attached for the Court’s convenience.

5. I certify that all of the forgoing statements made by me are true, and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: August 17, 2021

/s/ Jerry S. Goldman  
Jerry S. Goldman